

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE INTEL CORP. MICROPROCESSOR
ANTITRUST LITIGATION

MDL No. 05-1717-JJF

PHIL PAUL, on behalf of himself
and all others similarly situated,

Plaintiffs,

C.A. No. 05-485-JJF

V.

CONSOLIDATED ACTION

INTEL CORPORATION,

Defendant.

**CERTIFICATION OF BREE HANN IN SUPPORT OF
DEFENDANT INTEL CORPORATION'S REQUEST TO COMPEL
CLASS PLAINTIFFS TO PRODUCE DOCUMENTS**

I, Bree Hann, make this certification pursuant to Local Rule 7.1.1 and state that the following efforts and exchanges have been made by Intel Corporation (“Intel”) to reach agreement on the subject of the accompanying letter brief:

1. On February 23, 2007, my colleague, Todd Pickles, wrote to Douglas Park, one of class plaintiffs' attorneys, to ask plaintiffs to reconsider their objections to Requests Nos. 8 and 9 from Intel's First Set of Requests for Production. Attached as Exhibit A is a true and correct copy of that letter.

2. On March 2, 2007, Mr. Park responded by letter to Mr. Pickles, stating that plaintiffs would stand on their objections. Attached as Exhibit B is a true and correct copy of that letter.

4. On June 14, 2007, Robert Wozniak, counsel for class plaintiffs, responded by letter to me, again stating that plaintiffs would stand on their objections. Attached as Exhibit D is a true and correct copy of that letter.

5. On July 12, 2007, Intel served its Second Set of Requests for Production. That same day, I wrote to Mr. Wozniak and Mr. Park to ask if plaintiffs intended to stand on similar objections. Attached as Exhibit E is a true and correct copy of that letter.

6. On July 24, 2007, after receiving plaintiffs' responses and objections to Intel's Second Set of Requests for Production, I wrote to Mr. Wozniak and Mr. Park to reiterate Intel's position that the requests were relevant and to advise them that if plaintiffs did not intend to alter their position, Intel intended to seek relief from Judge Poppiti. Attached as Exhibit F is a true and correct copy of that letter.

Dated: July 31, 2007

Respectfully submitted,

By: /s/ Bree Hann

Bree Hann
BINGHAM McCUTCHEN LLP
Attorneys for Defendant
INTEL CORPORATION

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Richard L. Horwitz, hereby certify that on July 31, 2007, the attached document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

James L. Holzman
J. Clayton Athey
Prickett, Jones & Elliott, P.A.
1310 King Street
P.O. Box 1328
Wilmington, DE 19899

I hereby certify that on July 31, 2007, I have Electronically Mailed the attached document to the following non-registered participants:

Michael D. Hausfeld
Daniel A. Small
Brent W. Landau
Allyson B. Baker
Cohen, Milstein, Hausfeld
& Toll, P.L.L.C.
1100 New York Avenue, N.W.
Suite 500, West Tower
Washington, D.C. 20005
mhausfeld@cmht.com
dsmall@cmht.com
blandau@cmht.com
abaker@cmht.com

Michael P. Lehman
Thomas P. Dove
Alex C. Turan
The Furth Firm LLP
225 Bush Street, 15th Floor
San Francisco, CA 94104
mplehmann@furth.com
tdove@furth.com
aturan@furth.com

Steve W. Berman
Anthony D. Shapiro
Hagens Berman Sobol Shapiro, LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101
steve@hbsslaw.com
tony@hbsslaw.com

Guido Saveri
R. Alexander Saveri
Saveri & Saveri, Inc.
111 Pine Street, Suite 1700
San Francisco, CA 94111
guido@saveri.com
rick@saveri.com

By: /s/ Richard L. Horwitz
Richard L. Horwitz (#2246)
W. Harding Drane, Jr. (#1023)
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899-0951
(302) 984-6000
rhorwitz@potteranderson.com
wdrane@potteranderson.com

Dated: May 29, 2007
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